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ADMITTED IN N.Y. AND N.J.

November 5, 2013

The Honorable Jesse M. Furman
United States District Court
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: U.S. v. Tokhtakhounov, et al.,
No. 13-Cr.-0268 (JMF)

Dear Judge Furman:

We represent defendant Hillel Nahmad in the above-referenced action. We write with the consent of the Government to request a modification of Mr. Nahmad's bail conditions. Specifically, Mr. Nahmad's current bail conditions limit his travel to the Southern and Eastern Districts of New York. The agreed-upon modification, if approved by this Court, would allow Mr. Nahmad to travel from New York to the states of New Jersey, Connecticut and Florida. We have spoken with Mr. Nahmad's Pretrial Services Officer, who has no objection to this bail modification request.

Should the Court approve this request, Mr. Nahmad will notify his Pretrial Services Officer 48 hours prior to any overnight travel and provide the destinations and locations where he will be staying.

Thank you for your courtesy.

Respectfully submitted,



Benjamin Brafman

cc: Paul Shechtman, Esq. (by electronic mail)
Harris Fischman, Esq. (by electronic mail)
Josh Naftalis, Esq. (by electronic mail)